

Inho Andrew Park†‡  
Haesun Alexis Kim†  
Lana Ahreum Song†  
Steve J. Park†‡  
Saeyoung Kim†‡  
Jusun Yook†  
Sungwoong Lee‡  
David Wasserman†‡

Law Offices of  
**ANDREW PARK, P.C.**  
ANDREWPAKPC.COM  
450 7th Avenue, Suite 1805  
New York, NY 10123  
TEL: (212) 239-3680  
FAX: (212) 239-3683  
*Please respond to: New York Office*

The telephone conference currently scheduled for April 21, 2020 at 10:00 am is **ADJOURNED** until **May 21, 2020 at 10:00 am**. The parties are directed to call the Court's conference line at 866-390-1828, access code, 380-9799, at the scheduled time.

The Clerk of Court is respectfully directed to close the Letter Motion at ECF No. 41.

SO ORDERED

4/20/2020

**VIA ECF**

Honorable Sarah L. Cave  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

  
SARAH L. CAVE  
United States Magistrate Judge

**Re: Begani v. Marriott International Inc. et al.**  
**Docket No.: 1:18-cv-012000-ALC-SLS**

Dear Judge Cave:

This Office represents Plaintiff Skender Begani (hereinafter "Plaintiff") in the above referenced matter. Please allow this correspondence to serve as your undersigned and the counsel for Defendants 960 Associates LLC and Courtyard Management Corporation's joint request for adjournment of a telephone conference scheduled on April 21, 2010 at 10:00 am. The counsel for remaining Defendants 35<sup>th</sup> Street Ventures and Monarch Rooftop Lounge was not able to join in this instant request because the counsel has not responded to your undersigned's request for a consent to adjourn until now.

As per Your Honor's Minute Order dated December 3, 2019, the fact discovery was set for May 29, 2020. The Order also set dispositive motion deadline on October 30, 2020; expert deposition deadline on September 30, 2020; Pretrial Order deadline on November 30, 2020; and a telephone conference on April 21, 2020 at 10:00 before Your Honor.

Subsequently, due to the COVID-19 pandemic situation, by the Your Honor's Order dated March 16, 2020, all unexpired deadlines for the completion of fact depositions, fact discovery, expert depositions, expert discovery and/or all discovery were extended for a period of thirty (30) days. Currently, there are numerous outstanding discovery, including depositions of all relevant parties.

In light of outstanding discovery and the fact that the parties have not been and are currently unable to engage in a meaningful discovery due to the COVID-19 pandemic situation, your undersigned and the counsel for Defendants 960 Associates LLC and

Courtyard Management Corporation jointly and respectfully request that the telephone conference currently scheduled on April 21, 2020 at 10:00 am be adjourned for a period of thirty (30) days to May 21, 2020 at 10:00 am.

In the event that the Court is inclined to proceed with a telephone conference on April 21, 2020, due to the fact that the counsel for Defendants 960 Associates LLC and Courtyard Management Corporation is scheduled to appear for two other conferences on 10:00 am and 11:20 am on April 21, 2010 with the federal court, the undersigned and the counsel for Defendants 960 Associates LLC and Courtyard Management Corporation jointly request that the telephone conference in this matter be scheduled either on 9:30 am or any time after 12:00 pm.

This instant request is the parties' first-time application and no prior application has been made. Also, your undersigned has conferred with the counsel for Defendants 960 Associates LLC and Courtyard Management Corporation and has a consent to make this instant application. However, your undersigned does not have a consent from the counsel for remaining Defendants 35<sup>th</sup> Street Ventures and Monarch Rooftop Lounge because the counsel has not responded to your undersigned's request for a consent to adjourn until now. In addition, the instant request will not affect any other scheduled dates.

Very truly yours,

/s/ Jusun Yook

Jusun Yook, Esq.

CC via ECF:

Nicole Brown, Esq.  
Wade Clark Mulcahy, LLP  
180 Maiden Lane, Suite 901  
New York, New York 10038  
*Attorneys for Defendants 960 Associates LLC and Courtyard Management Corporation*

Mikey R. Schneider, Esq.  
Kennedys CMK LLP  
570 Lexington Avenue, 8<sup>th</sup> Floor  
New York, New York 10022  
*Attorneys for Defendants 35<sup>th</sup> Street Ventures i/s/h/a Monarch Rooftop Lounge and 35<sup>th</sup> Street Ventures, LLC*